

**VIA ECF**

The Honorable Judge Jesse M. Furman  
U.S. District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 1105  
New York, NY 10007

**RE: *Khalil v. Trump*, 1:25-cv-01935-JMF**  
**Motion for Leave to Accept Late Filing**

Dear Honorable Judge Furman:

Counsel for Petitioner in the above-referenced case respectfully submits this letter to update the Court that Respondents consent to Petitioner's motion at ECF 59 for leave to file the Petitioner's Motion for Release Under *Mapp v. Reno* and accompanying papers (ECF 52-58). Thank you for your consideration of this submission.

Sincerely,

/s/ Samah Sisay  
Samah Sisay  
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cc: Counsel for all parties